

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:23-CV-24299-MORENO/TORRES

MARIA ELENA CHAVEZ LETONA,

Plaintiff,

vs.

AMOR DE JESUS, CORP., SWEET LIVING FACILITY INC.,
JOSE MACHADO, ZELMIRA QUINONEZ, and AMINTA QUINONEZ,Defendants.
_____ /**PLAINTIFF'S TRIAL EXHIBIT LIST**

Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
1	Plaintiff's Requests for Admission to Defendant, Amor De Jesus, Corp.	Discovery Request/Response	Subject to objection in request and any trial objections		
2	Defendant, Amor De Jesus, Corp.'s Response to Plaintiff's Requests for Admission	Discovery Request/Response	Subject to objection in request and any trial objections		
3	Plaintiff's Requests for Admission to Defendant, Sweet Living Facility Inc.	Discovery Request/Response	Subject to objection in request and any trial objections		
4	Defendant, Sweet Living Facility Inc.'s Response to Plaintiff's Requests for Admission	Discovery Request/Response	Subject to objection in request and any trial objections		
5	Plaintiff's First Requests for Production to Defendants	Discovery Request/Response	Subject to objection in request and any trial objections		

Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
6	Defendants' Response to Plaintiff's First Requests for Production	Discovery Request/Response	Subject to objection in request and any trial objections		
7	Defendant, Amor De Jesus, Corp.'s 2021-2023 License - Assisted Living Facility With Limited Mental Health	Produced by Defendants (without Bates numbers).	Subject to objection in request and any trial objections		
8	Defendant, Sweet Living Facility Inc.'s 2020-2022 License - Assisted Living Facility With Limited Mental Health	Produced by Defendants (without Bates numbers).	Subject to objection in request and any trial objections		
9	Defendant, Zelmira Quinonez's 2022 Certificate of Achievement - Assisted Living Facility Core Competency Test	Produced by Defendants (without Bates numbers).	Subject to objection in request and any trial objections		
10	Defendant, Amor De Jesus, Corp.'s 2020 U.S. Tax Return	Produced by Defendants (without Bates numbers).	Subject to objection in request and any trial objections		
11	Defendant, Amor De Jesus, Corp.'s 2021 U.S. Tax Return	Produced by Defendants (without Bates numbers).	Subject to objection in request and any trial objections		
12	Defendants' Records of Zelle Payments to Plaintiff	Produced by Defendants (without Bates numbers).	Subject to objection in request and any trial objections		
13	Defendants' Zelle Payments Chart	Produced by Defendants (without Bates numbers).	Subject to objection in request and any trial objections		
14	Plaintiff's Response to Defendants' Interrogatories	Discovery Request/Response	Subject to objection in request and any trial objections		
15	Plaintiff's Response to Defendants' First Request for Production	Discovery Request/Response	Subject to objection in request and any trial objections		
16	WhatsApp Messages between Plaintiff and Defendant, Aminta Quinonez	Bates Letona 000001-001102	Subject to objection in request and any trial objections		
17	Text Messages between Plaintiff and Defendant,	Bates Letona 001103-001752, 001818-001819	Subject to objection in request and any trial objections		

Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
	Aminta Quinonez				
18	Text Messages between Plaintiff and Defendant, Zelmira Quinonez	Bates Letona 001753-001779	Subject to objection in request and any trial objections		
19	Bank Statements showing Zelle Transfers to Plaintiff (Redacted)	Bates Letona 001780-001814	Subject to objection in request and any trial objections		
20	Plaintiff's Passport	Bates Letona 001815-001817	Subject to objection in request and any trial objections		
21	Defendant, Aminta Quinonez's April 16, 2024 Deposition Transcript	Deposition Transcript	Subject to objection in request and any trial objections		
22	Defendant, Zelmira Quinonez's April 18, 2024 Deposition Transcript	Deposition Transcript	Subject to objection in request and any trial objections		
23	Defendant, Jose Machado's April 19, 2024 Deposition Transcript	Deposition Transcript	Subject to objection in request and any trial objections		
24	Defendant, Amor De Jesus, Corp.'s Articles of Incorporation	Florida Department of State - Division of Corporations	Subject to objection in request and any trial objections		
25	Annual Reports filed by Defendant, Amor De Jesus, Corp. with the Florida Secretary of State, 2008-2024	Florida Department of State - Division of Corporations	Subject to objection in request and any trial objections		
26	2012 Amendment to Defendant, Amor De Jesus, Corp.'s Articles of Incorporation	Florida Department of State - Division of Corporations	Subject to objection in request and any trial objections		
27	Defendant, Sweet Living Facility's Articles of Incorporation	Florida Department of State - Division of Corporations	Subject to objection in request and any trial objections		
28	Annual Reports filed by Defendant, Sweet Living Facility Inc. with the Florida	Florida Department of State - Division of Corporations	Subject to objection in request and any trial objections		

Exhibit Number	Description	Bates Range / Other Source	Objections and Reasons	Date Identified	Date Admitted
	Secretary of State, 2005-2024				
29	2006 Amendment to Defendant, Sweet Living Facility Inc.'s Articles of Incorporation	Florida Department of State - Division of Corporations	Subject to objection in request and any trial objections		
30	2013 Amendment to Defendant, Sweet Living Facility Inc.'s Articles of Incorporation	Florida Department of State - Division of Corporations	Subject to objection in request and any trial objections		
31	Documents produced by the Florida Agency for Health Care Administration in response to Plaintiff's Public Records Request	Florida Agency for Health Care Administration (Bates Letona 001820-002006)	Subject to objection in request and any trial objections		
32	Documents downloaded from the Florida Agency for Healthcare Administration regarding the Defendants	Florida Agency for Health Care Administration	Subject to objection in request and any trial objections		
33	All Exhibits identified by Defendants		Subject to objection in request and any trial objections		
34	All Exhibits needed for impeachment		Subject to objection in request and any trial objections		

Respectfully submitted this 30th day of October 2024.

s/ Patrick Brooks LaRou
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